

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RAYMOND L. AND TERRYLL ANN
WALLS,

Plaintiffs,

v.

VRE CHICAGO ELEVEN, LLC, *et al.*,

Defendants.

Case No. 1:16-cv-04048

Judge Thomas M. Durkin

JOINT MOTION TO CONTINUE INITIAL STATUS CONFERENCE

Plaintiffs Raymond and Terryll Ann Walls, and Defendants VRE Chicago Eleven, LLC, Verdad Real Estate, Inc., EXP Realty Advisors, Inc. and Tartan Realty Group, Inc., by their respective undersigned counsel, being all of the parties to this action (collectively, the “Parties”), hereby move the Court to continue the initial status hearing now set for June 14, 2016, at 9:00 a.m., to a date on or after June 28, 2016 that fits with the Court’s schedule, and reset the deadline for filing a joint status report to a date four business days before the new initial status hearing date.

As grounds for this motion, the Parties state:

1. Plaintiffs commenced this action on April 5, 2016.
2. The Court entered an Order on April 8, 2016 (Doc. #10), setting an initial status hearing for June 14, 2016, at 9:00 a.m., and directing that a joint status report be filed by June 9, 2016.
3. While the deadline for three of the defendants to answer or otherwise respond to the Complaint is June 6, 2016, the deadline for the remaining defendant is June 14, 2016, due to

the initial mailing to that Defendant forwarding the request for waiver of service being returned, and having to be resent to a different address.

4. The Parties believe it would be beneficial to the Court as well as the Parties to defer the initial status hearing and submission of their initial joint status report until shortly after all of the defendants have filed their answers or other responses to the Complaint.

5. The Parties suggest a new initial status hearing date of June 28, 2016, or as soon thereafter as is convenient for the Court, and that the deadline for filing a joint status report be reset so as to correspond to the new hearing date.

6. The suggested deferral period is only 14 days and, accordingly, will not interfere with this action proceeding in a timely manner.

WHEREFORE, the Parties respectfully request the Court to continue the initial status hearing to a date on or after June 28, 2016 that fits with the Court's schedule; reset the deadline for filing a joint status report to a date four business days before the new initial status hearing date; and grant such other and further relief as the Court may deem just and proper.

Respectfully submitted,

/s/Gerald P. Greiman

Gerald P. Greiman, MO Bar No. 26668

Ryan C. Hardy, IL Bar No. 6304782

SPENCER FANE LLP

1 N. Brentwood Blvd., Suite 1000

St. Louis, MO 63105

314-863-7733 (Telephone)

314-862-4656 (Facsimile)

ggreiman@spencerfane.com

rhardy@spencerfane.com

and

Sharon Doherty Sirott, IL Bar No. 6236973
MARTINSIROTT LLC
30 N LaSalle St., Suite 3400
Chicago, IL 60602
312-368-9000 (Telephone)
312-962-4448 (Facsimile)
ssirott@martinsirott.com

Attorneys for Plaintiffs

/s/Robert P. Greenspoon (w/permission)
Robert P. Greenspoon, IL Bar No. 6229357
(Appearance to be filed)
FLACHSBART & GREENSPOON
333 N. Michigan Ave., 27th Floor
Chicago, IL 60601-3901
312-551-9500 (Telephone)
312-551-9501 (Facsimile)
rpg@fg-law.com

*Attorneys for Defendants VRE Chicago Eleven,
LLC and Verdad Real Estate, Inc.*

/s/ Justin Penn (w/permission)
Justin Penn, IL Bar No. 6283726
(Appearance to be filed)
HINSHAW & CULBERTSON, LLP
222 N. LaSalle Street, Suite 300
Chicago, IL 60601
312-704-3157 (Telephone)
312-704-3001 (Facsimile)
jpenn@hinshawlaw.com

*Attorneys for Defendants Tartan Realty Group,
Inc., and EXP Realty Advisors, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2016, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court, to be served by the Court's electronic notification system upon all attorneys of record, and additionally was sent by e-mail to:

Robert P. Greenspoon, IL Bar No. 6229357
(Appearance to be filed)
FLACHSBART & GREENSPOON
333 N. Michigan Ave., 27th Floor
Chicago, IL 60601-3901
312-551-9500 (Telephone)
312-551-9501 (Facsimile)
rpg@fg-law.com

*Attorneys for Defendants VRE Chicago Eleven,
LLC and Verdad Real Estate, Inc.*

Justin Penn, IL Bar No. 6283726
(Appearance to be filed)
HINSHAW & CULBERTSON, LLP
222 N. LaSalle Street, Suite 300
Chicago, IL 60601
312-704-3157 (Telephone)
312-704-3001 (Facsimile)
jpenn@hinshawlaw.com

*Attorneys for Defendants Tartan Realty Group,
Inc., and EXP Realty Advisors, Inc.*

/s/Gerald P. Greiman